

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

PATRICIA CONTE &
MICHAEL CONTE, wife and husband

Plaintiffs,

v.

GREGORY JAMES MCGRAW

Defendant.

NO. 2:17-cv-04343-AB

STIPULATION AND ORDER

AND NOW, this 1st day of December, 2017, IT IS HEREBY AGREED amongst all parties of record in this matter, Plaintiffs, Patricia Conte and Michael Conte ("Plaintiffs") and Defendant, Gregory James McGraw ("Defendant"), by and through their undersigned counsel, as follows:

1. It is STIPULATED, agreed and acknowledged by Defendant that:
 - a. He currently resides at 1737 Polo Run Drive, Yardley, Pennsylvania;
 - b. He resided at 1737 Polo Run Drive, Yardley, Pennsylvania at the time of the motor vehicle accident of October 11, 2015;
 - c. At all times before the motor vehicle accident of October 11, 2015 and since the time of accident, Defendant resided in Bucks County, Pennsylvania;
 - d. At no time before, during or since the motor vehicle accident of October 11, 2015 did Defendant reside in the State of New Jersey.
2. Accordingly, in light of the above, all parties AGREE that the Civil Action captioned *Patricia Conte and Michael Conte, wife and husband v. Gregory James McGraw*, U.S.D.C. Eastern

District of Pennsylvania under Docket Number 2:17-cv-04343-AB may be DISCONTINUED WITHOUT PREJUDICE.

3. Defendant AGREES to waive any defense of statute of limitations, laches or untimeliness should facts or circumstances be uncovered which warrant further or future litigation against Defendant in connection with the motor vehicle accident of October 11, 2015.

This Stipulation may be signed in counterpart.

TABAKINWOLFE LLP

BY: Brad S. Tabakin /s/
BRAD S. TABAKIN, ESQUIRE
Attorney for Plaintiffs

LAW OFFICES OF HUBSHMAN AND FLOOD

BY: Theresa Martin Lostracco /s/
THERESA MARTIN LOSTRACCO, ESQUIRE
Attorney for Defendant

ORDERED AND APPROVED BY THE COURT:

Reeta B. Brey
J.

12/4/17

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